

EXHIBIT 4

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(FILED UNDER SEAL)

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February 25, 2013

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Highly Confidential – Attorneys Eyes Only

Via Electronic Mail

Chris Franklin
WILMER CUTLER PICKERING HALE AND DOOR LLP
950 Page Mill Road
Palo Alto, CA 94304
Christopher.Franklin@wilmerhale.com

Re: MediaTek Inc. v. Freescale Semiconductor, Inc., No. 4:11-cv-05341 (YGR)

Dear Chris:

I write in response to Nathan Walker's email regarding alleged deficiencies in Freescale's production of documents providing financial information for Freescale's accused products. Specifically, Nathan asserted that a number of Freescale products were improperly omitted from documents bearing the Bates ranges FSL-00125852, FSL-00125853-955, FSL-00125956-70, FSL-00125971-6004, and FSL-00126005-12.

As I informed you during our February 15 telephonic meet-and-confer, Freescale has investigated the allegedly omitted products and found that none of the products identified by Nathan were improperly excluded. In particular, all of the products that Nathan identified fall into one of four categories: (1) products that Freescale has not sold; (2) products that Freescale has not sold within the U.S.; (3)

and (4)

The specific products are addressed below.

1. No sales of identified products. Freescale has not sold the following product numbers identified by Nathan:

- KMC8358CVVAGDGA
- KMC8358CZUAGDGA

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- KMC8358ECVRAGDDA
- KMC8358ECVRAGDGA
- KMC8358ECVVAGDGA
- KMC8358ECZQAGDDA
- KMC8358ECZQAGDGA
- KMC8358ECZUAGDGA
- KMC8360CZUAJDGA
- KMC8360ECVVAJDGA
- KMC8360ECZUAJDGA
- KMPC8358CVRAGDGA
- KMPC8358CVVAGDG
- KMPC8358CZQAGDDA
- KMPC8358CZQAGDGA
- KMPC8358CZUAGDG
- KMPC8358ECVVAGDG
- KMPC8358EVRAGDDA
- KMPC8358EVRAGDGA
- KMPC8358EVVAGDG
- KMPC8358EZQAGDDA
- KMPC8358EZQAGDGA
- KMPC8358EZUAGDG
- KMPC8358VRAGDDA
- KMPC8358VRAGDGA
- KMPC8358VVAGDGA
- KMPC8358ZQAGDDA
- KMPC8358ZQAGDGA
- KMPC8358ZUAGDG
- KMPC8358ZUAGDGA
- KMPC8360EVVAHFH
- KMPC8360EVVAHFHA
- KMPC8360EVVALFGA
- KMPC8360EZUAHFH
- KMPC8360EZUAHFHA
- KMPC8360EZUAJDG
- KMPC8360EZUAJDGA
- KMPC8360EZUALFG
- KMPC8360EZUALFGA
- KMPC8360VVVAHFH

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- KMPC8360VVAHFHA
- KMPC8360VVALFGA
- KMPC8360ZUAHFH
- KMPC8360ZUAHFHA
- KMPC8360ZUALFG
- KMPC8360ZUALFGA
- KMPC8360ZUALFHA
- MCF52210CVM66J
- MCF52211CVM66J
- MCF52211CVM80J
- MCF52256CVN66J
- MCF52256VN80J
- MCF52268AG80
- MCF52268VN80J
- MCFE52256CVN66
- MCFE52256VN80
- MCFE52258CVN66
- MCFE52258VN80
- MCIMX31CJKN5DR2
- MCIMX31CJMN4DR2
- MCIMX31CVKN5CR2
- MCIMX31CVKN5DR2
- MCIMX31CVMN4DR2
- MCIMX31DJKN5D
- MCIMX31DJKN5DR2
- MCIMX31DVKN5C
- MCIMX31DVKN5CR2
- MCIMX31DVKN5R2
- MCIMX31DVMN5C
- MCIMX31DVMN5CR2
- MCIMX31DVMN5DR2
- MCIMX31LCJMN4D
- MCIMX31LCJMN4DR2
- MCIMX31LCVKN5CR2
- MCIMX31LDVKN5C
- MCIMX31LDVKN5CR2
- MCIMX31LDVMN5C
- MCIMX31LDVMN5CR2

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- MCIMX31LDVMN5DR2
- MCIMX31VKN5BR2
- MCIMX31VMN5BR2
- MCIMX31VMN5CR2
- MCIMX351AJM4B
- MCIMX351AJM4BR2
- MCIMX351AJM5B
- MCIMX351AJM5BR2
- MCIMX351AJQ5B
- MCIMX351AJQ5BR2
- MCIMX351AJQ5CR2
- MCIMX351AVM5B
- MCIMX351AVM5BR2
- MCIMX353CJQ5CR2
- MCIMX353CVM5BR2
- MCIMX353DVM5BR2
- MCIMX355AJM4B
- MCIMX355AJM4B
- MCIMX355AJM4BR2
- MCIMX355AJM4BR2
- MCIMX355AJM5B
- MCIMX355AJM5B
- MCIMX355AJM5BR2
- MCIMX355AJM5BR2
- MCIMX355AJQ5B
- MCIMX355AJQ5B
- MCIMX355AJQ5BR2
- MCIMX355AJQ5BR2
- MCIMX355AJQ5CR2
- MCIMX355AJQ5CR2
- MCIMX355AVM4BR2
- MCIMX355AVM4BR2
- MCIMX357CJM5B
- MCIMX357CJM5BR2
- MCIMX357CVM5BR2
- MCIMX502EVM8B
- MCIMX503CVK8B
- MCIMX503CVK8BR2

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- MCIMX503CVM8BR2
- MCIMX503EVM8B
- MCIMX508CVM8BR2
- MCIMX508CZK8B
- MCIMX512DJM8CR2
- MCIMX513CJM6CR2
- MCIMX513DJM8CR2
- MCIMX515DJK8C
- MPC8358CVRAGDGA
- MPC8358CVVADDE
- MPC8358CVVAGDG
- MPC8358CVVAGDGA
- MPC8358CZQADDDA
- MPC8358CZQAGDDA
- MPC8358CZQAGDGA
- MPC8358CZUADDE
- MPC8358CZUAGDG
- MPC8358CZUAGDGA
- MPC8358ECVRAGDGA
- MPC8358ECVVADDE
- MPC8358ECVVADDEA
- MPC8358ECVVAGDGA
- MPC8358ECZQADDDA
- MPC8358ECZQAGDDA
- MPC8358ECZUADDE
- MPC8358ECZUADDEA
- MPC8358ECZUAGDG
- MPC8358EVRADDDA
- MPC8358EVVADDEA
- MPC8358EZQADDDA
- MPC8358EZUADDE
- MPC8358ZQADDDA
- MPC8358ZQAGDGA
- MPC8358ZUAGDGA
- MPC8360ECZUAGDG
- MPC8360ECZUAGDGA
- MPC8360EVVAHFH
- MPC8360EZUAHFH

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- MPC8360VVAHFH
- MPC8360ZUAHFH
- MPC8360ZUALFG
- PCF52211CEP66
- PCF52252AF80
- PCF52252CAF66
- PCF52254AF80
- PCF52255CAF80
- PCF52256AG80
- PCF52256CAG66
- PCF52256CVN66
- PCF52256VN80
- PCF52258AG80
- PCF52258CVN66
- PCF52259CVN80
- PCIMX31CVMN4R2
- PCIMX31LCVMF4CR2
- PCIMX31LCVMN5B
- PCIMX31LCVMN5BR2
- PCIMX31LVKN5CR2
- PCIMX31LVZN5
- PCIMX31LVZN5C
- PCIMX31LVZN5CR2
- PCIMX31LVZN5R2
- PCIMX31VKN5CR2
- PCIMX31VKN5R2
- PCIMX31VMN5B
- PCIMX31VMN5BR2
- PCIMX351AVM4B
- PCIMX351AVM4BR2
- PCIMX355AVM5B
- PCIMX355AVM5B
- PCIMX355AVM5BR2
- PCIMX355AVM5BR2
- PCIMX357CJM5B
- PCIMX357CJM5BR2
- PCIMX357CJQ5C
- PCIMX357CJQ5CR2

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- PCIMX357CVM5BR2
- PCIMX515DVM8C
- SCIMX31DVKN6C
- SCIMX31DVKN6CR2
- SCIMX31LCVMN5B
- SCIMX31LCVMN5BR2
- SCIMX31LDVKN6C
- SCIMX31LDVKN6CR2
- SCIMX31LVKM5
- SCIMX31LVKN5
- SCIMX31LVKN5R2
- SCIMX31LVKT5
- SCIMX31LVKT5R2
- SCIMX353DJQ5C
- SCIMX357DJQ5C
- SCIMX357DJQ5CR2

2. **No U.S. sales of identified products.** Freescale has not sold the following product numbers identified by Nathan in the United States:

- KMC8360CVVAJDGA
- KMPC8358CVRAGDDA
- KMPC8358ECZUAGDG
- KMPC8358EVVAGDGA
- KMPC8358EZUAGDGA
- KMPC8360CVVAJDG
- KMPC8360ECVVAJDG
- KMPC8360ECZUAJDG
- KMPC8360EVVAJDG
- KMPC8360EVVAJDGA
- KMPC8360EVVALFG
- KMPC8360EVVALFHA
- KMPC8360VVAJDG
- KMPC8360VVAJDGA
- KMPC8360VVALFG
- KMPC8360VVALFHA
- MCIMX31CVMN4D
- MCIMX31DVKN5DR2

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- MCIMX31LCVKN5DR2
- MCIMX355AVM5BR2
- MCIMX355AVM5BR2
- MCIMX357DJQ5CR2
- MCIMX502CVK8B
- MCIMX508CVK8BR2
- MCIMX512CJM6CR2
- MCIMX515CJM6CR2
- MCIMX515DJM8CR2
- MCIMX515DVK8B
- MCIMX515DVM8B
- MPC8358CVRADDDA
- MPC8358CVVADDEA
- MPC8358ECVRADDDA
- MPC8358EVRAGDGA
- MPC8358EZQAGDGA
- MPC8358VRADDDA
- MPC8358VRAGDGA
- MPC8358ZQAGDDA
- MPC8360CZUAGDGA
- MPC8360ZUAGDG
- MPC8360ZUAGDGA
- PCIMX515DVK8C
- PCIMX516AJM6CR2

As the parties have previously discussed, despite Freescale's objections that worldwide sales data are not relevant, MediaTek has insisted that Freescale produce such data. Consequently, sales data for these product numbers should be included when Freescale produces worldwide sales data later this week.

3. **No sales during the relevant time period.** The below products identified by Nathan are only accused of infringing the '331 patent. [REDACTED]

• [REDACTED]

1. The first step in the process is to identify the problem or issue that needs to be addressed. This involves gathering information and understanding the context of the problem.

- [illegible]

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Sincerely,

/s/ Joshua A. Hartman

Joshua A. Hartman